

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RENE LUGO-BARCENAS, et. al,

Defendants.

Case No. 18-00134-01/17-CR-W-GAF

GOVERNMENT’S SUPPLEMENTAL NOTICE OF EXPERT WITNESSES

Comes now the United States of America, by and through its undersigned attorney, and respectfully notifies the Court and defense counsel of its intent to call the following expert witnesses at trial.

EXPERT TESTIMONY

The Government may call the following persons as experts to testify in the subject areas indicated. The Government will provide a copy of the witnesses’ curriculum vitae to defense counsel.

- 1. Douglas Dorley, Special Agent**
Drug Enforcement Administration (DEA), Special Agent

Subject area: Special Agent (SA) Douglas Dorley will testify regarding drug trafficking methods used by drug traffickers. More specifically, he will testify as to how methamphetamine is transported, packaged, and sold; trafficking amounts versus user amounts of methamphetamine, including amounts typically sold; and the dollar value of methamphetamine. The government will provide SA Dorley’s curriculum vitae, which details his qualifications as an expert witness in the area of drug trafficking, to counsel for the defense to supplement this Notice. SA Dorley has been a Special Agent with the DEA in the Kansas City office since 2006, and has a wealth of experience, education, and training related to drug trafficking.

2. Shana Hawkins

Kansas City, Missouri Police Department Crime Laboratory (KCPDCL), Forensic Specialist IV

Subject Area: Ms. Hawkins area of expertise is in the area of DNA analysis. She will testify consistent with KCPDCL lab reports provided to the defense as part of the discovery process. Ms. Hawkins will testify regarding her analysis of DNA samples provided to the KCPDCL that correspond to defendant Michael Runions. Ms. Hawkins will discuss the results of her testing and analysis. The government will provide Ms. Hawkins' curriculum vitae to counsel for the defense to supplement this Notice. Ms. Hawkins has been employed at the KCPDCL since 2006, and specifically in the area of DNA analysis since 2013. She has received extensive education and real world experience in the area of DNA analysis. Ms. Hawkins has testified as an expert in DNA analysis in both State and Federal courts.

3. Sally Ho, Ph.D.

Drug Enforcement Administration (DEA), Forensic Chemist

Subject Area: Ms. Ho's area of expertise is forensic chemistry. She will testify consistent with DEA lab reports provided to the defense as part of the discovery process. Ms. Ho will testify regarding her forensic analysis of controlled substances recovered as part of this investigation, including recovered methamphetamine. Ms. Ho will discuss the results of her testing and analysis. The government will provide Ms. Ho's curriculum vitae to counsel for the defense to supplement this Notice. Ms. Ho has been a Forensic Chemist since 2015, has been qualified in an expert witness in other jurisdictions, regularly presents regarding her area of expertise, and has published numerous articles in her area of expertise.

4. Robert J. Smith, II

Kansas City, Missouri Police Department Crime Laboratory (KCPDCL), Forensic Specialist II

Subject Area: Mr. Smith's area of expertise is in firearms, and more specifically, as a firearms technician within the KCPDCL. He will testify consistent with KCPDCL lab reports provided to the defense as part of the discovery process. Mr. Smith will testify regarding his analysis of a firearm recovered during the search of defendant Runions' home. Mr. Smith will discuss the results of his analysis, including the functionality of the firearm in question. The government will provide Mr. Smith's curriculum vitae to counsel for the defense to supplement this Notice. Mr. Smith has worked as a firearms technician and forensic specialist for the KCPDCL since

2004 and has testified in State Courts in Kansas and Missouri, as well as Federal Court. Mr. Smith undergoes continuing education with regard to firearms, and has extensive experience in the area of firearms examinations.

5. Lucretia Weber

Kansas City, Missouri Police Department Crime Laboratory (KCPDCL), Forensic Specialist IV

Subject area: Ms. Weber's area of expertise is forensic chemistry. She will testify consistent with KCPDCL crime lab reports provided to the defense as part of the discovery process. Ms. Weber will testify regarding her forensic analysis of controlled substances recovered as part of this investigation, including recovered methamphetamine. Ms. Weber will discuss the results of her testing and analysis. The government will provide Ms. Weber's curriculum vitae to counsel for the defense to supplement this Notice. Ms. Weber has been a forensic chemist since 1997 for either the DEA or the KCPDCL. In addition to her extensive work in the field of forensic chemistry, Ms. Weber undergoes continuing education in her field of expertise and has testified in multiple Federal Court districts across the country, as well as multiple State courts.

6. Stephen T. White, Special Agent

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), Special Agent

Subject area: Special Agent White's area of expertise is firearms' classification and the interstate nexus of firearms. He will testify that the firearm recovered in this case was not manufactured in the State of Missouri and had traveled in interstate commerce.

Respectfully submitted,

Timothy A. Garrison
United States Attorney

By */s/ Patrick C. Edwards*

Patrick C. Edwards
Assistant United States Attorney

Charles Evans Whittaker Courthouse
400 East Ninth Street, Room 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on January 19, 2021, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Patrick C. Edwards

Patrick C. Edwards

Assistant United States Attorney